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Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MICHELLE RONQUILLO,

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

Case No. 3:18-cv-00306-MMD-WGC

**STIPULATION AND ~~PROPOSED~~ ORDER  
FOR EXTENSION OF TIME FOR  
DEFENDANT TO FILE OPPOSITION TO  
PLAINTIFF'S MOTION TO REMAND**

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall have an extension of time of 60 days to file her opposition to Plaintiff's motion to remand, from November 29, 2018, to January 28, 2019.

This is the first continuance in this case and sought by Defendant. There is good cause for this request. Defendant is seeking this extension due to Defendant's counsel's crowded briefing schedule with multiple deadlines on or around November 29, 2018, including cases that had been previously extended. In addition, at the filing of Plaintiff's motion for remand, new matters that were not previously anticipated and could not be shifted had arisen and have created some crowding of the

1 briefing schedule around the due date of this case. Moreover, for about two and half weeks in early to  
2 mid-November, Defendant's counsel experienced sickness from a cold/virus that incapacitated her and  
3 inhibited her ability to work for multiple days. As a result, Defendant's counsel continues to address her  
4 existing workload and shift and prioritize her matters including this case, as needed, given the  
5 circumstances and as Defendant's counsel continues to address a full and growing workload for at least  
6 the next two months with variable degrees of ability to be adjusted.

7 Because of the factors described above, Defendant is requesting additional time up to and  
8 including January 28, 2019, to fully review the administrative record and research the issues presented  
9 by Plaintiff's motion to remand. This request is made in good faith with no intention to unduly delay the  
10 proceedings.

11 Therefore, with this Court's approval, the Court's scheduling order shall be extended by 60 days,  
12 so that Defendant may file her opposition to Plaintiff's motion to remand on or before January 28, 2019.

13 Respectfully submitted,

14  
15 Dated: November 28, 2018

LAW OFFICES OF LAWRENCE D. ROHLFING

16 /s/ Cyrus Safa

(as authorized via e-mail on 11/28/2018)

17 CYRUS SAFA

18 Attorneys for Plaintiff

19 Dated: November 28, 2018

STEVEN W. MYHRE

20 Acting United States Attorney

21 /s/ Carolyn B. Chen

CAROLYN B. CHEN

22 Special Assistant United States Attorney  
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1 ORDER

2 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

3  
4 DATED: November 29, 2018

William G. Cobb

5 HON. WILLIAM G. COBB  
6 UNITED STATE MAGISTRATE JUDGE  
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